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8 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

9 UNITED STATES DISTRICT COURT

10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 YAN SUI,

15 Defendant.  
16

CR No. 2:24-cr-00498-JAK

GOVERNMENT STATUS REPORT RE  
DISCOVERY CONFERENCE

Trial Date: October 15, 2024  
Trial Time: 9:00 am  
Location: Courtroom of the  
Hon. John A.  
Kronstadt

17  
18 Plaintiff United States of America, by and through its counsel  
19 of record, the United States Attorney for the Central District of  
20 California and Assistant United States Attorney Matt Coe-Odess,  
21 hereby submits this status report regarding the discovery conference  
22 pursuant to the Court's Standing Order for Criminal Cases (the  
23 "Order").

24 Despite the government's attempts to confer before filing this  
25 report, defendant YAN SUI ("defendant") did not provide substantive  
26 input and instead filed his own status report in the related matter,  
27 8:24-CR-00048-JAK, at Docket Number 33 ("defendant's Report").  
28

1        Status of Discovery: The government has produced approximately  
2 1,716 pages of discovery, including filings and other materials  
3 relating to the criminal contempt charges, through its file-transfer  
4 system (USAFX). The government has also made all of these materials  
5 available for defendant's inspection and offered to provide hard  
6 copies to defendant. Defendant stated he did not want discovery  
7 other than grand jury transcripts. The government does not currently  
8 anticipate making further discovery productions. The government  
9 acknowledges that its duty to disclose discovery is a continuing one.  
10 Defendant has not produced any discovery to the government at this  
11 time.

12        Discovery Disputes: Defendant has filed a motion seeking grand  
13 jury transcripts. The government intends to oppose this motion. The  
14 parties have not identified any other contested matters of discovery  
15 or inspection at this time.

16        In the related case, 8:24-CR-00048-JAK, at Docket Number 34,  
17 defendant filed a "Request for Discovery Pursuant to Initial Standing  
18 Order for Criminal Cases" on September 1, 2024. However, prior to  
19 the filing of this request, the government had already made discovery  
20 available to defendant via USAFX, but defendant responded that he did  
21 not wish to create a USAFX account because of privacy reasons. (As  
22 far as the government can tell, however, it appears defendant did  
23 create a USAFX account and can access the platform.) After the  
24 government offered to deliver the discovery via hard drive or hard  
25 copies available for pick up, defendant said he did not want  
26 discovery. Defendant then filed his request for discovery without  
27 further meet and confer. The government is in the process of  
28 arranging for delivery of hard copies of discovery to defendant.

1        Defendant's Motions: Defendant has filed: (1) a motion to  
2 obtain transcript of the grand jury indictment (Dkt. 13), (2) a  
3 motion to change venue (Dkt. 16), (3) a motion to dismiss the  
4 indictment (Dkt. 17). The government intends to oppose these  
5 motions. Defendant has also filed a "cross-complaint of counter  
6 claims conversion abuse of process civil/criminal aid abetting  
7 trespassing IIED injunctive relief constitutional relief declaratory  
8 relief" (Dkt. 20). The government is evaluating this filing.

9        Trial Date: Defendant has declined to tell the government  
10 whether he wishes to proceed to trial on October 15, 2024. The  
11 government is prepared to go to trial on October 15, 2024.

12        Anticipated Length of Trial: Approximately one to two days.  
13

14 Dated: September 5, 2024

Respectfully submitted,

15 E. MARTIN ESTRADA  
16 United States Attorney

17 MACK E. JENKINS  
18 Assistant United States Attorney  
Chief, Criminal Division

19  
20        /s/  
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MATT COE-ODESS  
Assistant United States Attorney

21 Attorneys for Plaintiff  
22 UNITED STATES OF AMERICA  
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